REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed January 28, 2008. Claims 1-23 were pending in the present application. This Amendment amends claims 1, 8, and 14, leaving pending in the application claims 1-23. Reconsideration of the rejected claims is respectfully requested.

35 U.S.C. §103(a) Rejection of Claims 1-3, 6-11, 14-17, and 20

Claims 1-3, 6-11, 14-17, and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Oka (U.S. Patent No. 7,102,639, hereinafter "Oka") in view of Brunelle (U.S. Patent No. 5,999,194, hereinafter "Brunelle"). Applicant respectfully submits that Oka and Brunelle, considered individually or in combination, do not teach or suggest the features of these claims.

Embodiments of the present invention are directed to techniques for specifying scene data for a frame of computer animation. As described in the Specification, a frame of computer animation is rendered by retrieving scene descriptor data associated with the frame. The scene descriptor data includes a plurality of specifications for one or more objects, each specification being associated with a user-defined purpose for rendering the frame. Merely by way of example, a first specification for an object may be associated with the purpose of previewing lighting, and a second specification for the object may be associated with the purpose of previewing scene composition. A selection of a rendering option is then received, where the selected rendering option indicates a specific user-defined purpose for rendering the frame. Based on the selected rendering option and the scene descriptor data, the appropriate specification for the object is loaded and the frame is rendered. (Specification: paras. 33-41).

In one set of embodiments, the various specifications for a given object included in the scene descriptor data are independent of each other. In other words, they each include distinct content, and there is no general algorithm to derive one specification from another. Thus, for example, a first specification for a light object may be a hard spotlight, and a second specification for the same light object may be a completely different type of light, such as a soft,

omni-directional light. (Specification: para. 120). In this manner, the appearance and/or function of an object in a scene may be completely altered based on a selected rendering option.

In accordance with the above, Applicant's independent claim 1 (as amended) recites, in part:

> retrieving scene descriptor data associated with the frame of animation, wherein the scene descriptor data includes a first specification of at least one object, the first specification being associated with a first user-defined purpose for rendering the frame of animation, wherein the scene descriptor data includes a second specification of the at least one object, the second specification being associated with a second user-defined purpose for rendering the frame of animation, and wherein the first and second specifications are independent of each other;...
>
> (Applicant's independent claim 1 in part, as amended, emphasis added).

Applicant submits that at least the above features are not taught or suggested by Oka and/or Brunelle. For example, Oka and Brunelle fail to teach or suggest retrieving scene descriptor data including a first specification and a second specification for an object, "wherein the first and second specifications are independent of each other" as recited in amended claim 1. (Emphasis added).

Oka is directed to a method for rendering an object image at varying levels of detail based on an attribute of the object image. (Oka: col. 2, lines 10-21). For example, the object image of Oka may be rendered using a first, high level of detail (LOD) representation or a second, low LOD representation based on the object image's speed at a particular frame. (*See* Oka: Fig. 9). Significantly, the first and second representations for the object image are dependent on each other; specifically, the second representation is derived by simplifying the first. (Oka: col. 3, lines 1-15: "The image processing apparatus further comprises a simplifying device that simplifies the first data to generate the second data..."). Since the first and second representations in Oka are necessarily dependent representations, they cannot be considered "independent of each other" as recited independent claim 1.

The deficiencies of Oka in this regard are not remedied by Brunelle. Brunelle is directed to a method for creating in-between frames for a computer animation based on a source key frame and a target key frame. (Brunelle: Abstract). The in-between frames may be rendered at various levels of detail, for example using a wireframe preview mode or a low-resolution

preview mode. (Brunelle: col. 10, lines 9-58). Thus, like Oka, Brunelle merely teaches rendering various representations of an object/scene, where the representations are simply more detailed or less detailed versions of each other. Accordingly, Brunelle also fails to teach or suggest "wherein the first and second specifications are independent of each other" as recited in amended claim 1.

Further, since Oka and Brunelle fail to teach or suggest the recited first and second specifications of amended claim 1, Oka and Brunelle necessarily fail to teach or suggest the remaining features of claim 1, such as "querying a database... for a first representation of the one object in response to the first specification...," "receiving the first representation...," and "loading the first representation..."

For at least the foregoing reasons, even if Oka and Brunelle were combined (although there appears to be no rationale for combining), the resultant combination would not teach or suggest the various features of claim 1. Accordingly, Applicant respectfully requests that the rejection of claim 1 be withdrawn.

Independent claims 8 and 14 have been amended to recite features that are substantially similar to independent claim 1, and are thus believed to be allowable over Oka and Brunelle for at least a similar rationale as discussed for claim 1, and others.

Dependent claims 2, 3, 6, 7, 9-11, 14-17, and 20 depend (either directly or indirectly) from independent claims 1, 8, and 14 respectively, and are thus believed to be allowable over Oka and Brunelle for at least a similar rationale as discussed for claims 1, 8, and 14, and others.

35 U.S.C. §103(a) Rejection of Claims 4, 12, 18, and 22

Claims 4, 12, 18, and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Oka in view of Harvill et al. (U.S. Patent No. 6,559,845, hereinafter "Harvill"). Applicant respectfully submits that Oka and Harvill, considered individually or in combination, do not teach or suggest the features of these claims.

Dependent claims 4, 12, 18, and 22 depend (either directly or indirectly) from independent claims 1, 8, and 14 respectively, which are not rendered obvious by Oka as

discussed above. As best understood, Harvill does not provide any teaching that would remedy the deficiencies of Oka in this regard. For at least this reason, even if Oka and Harvill were combined (although there appears to be no rationale for combining), the resultant combination would not teach or suggest the various features of claims 4, 12, 18, and 22. Accordingly, Applicant respectfully requests that the rejection of claims 4, 12, 18, and 22 be withdrawn.

35 U.S.C. §103(a) Rejection of Claims 5, 13, 19, and 23

Claims 5, 13, 19, and 23 are rejected under 35 U.S.C. §103(s) as being unpatentable over Oka in view of Gagne (U.S. Patent No. 6,353,437, hereinafter "Gagne"). Applicant respectfully submits that Oka and Gagne, considered individually or in combination, do not teach or suggest the features of these claims.

Dependent claims 5, 13, 19, and 23 depend (either directly or indirectly) from independent claims 1, 8, and 14 respectively, which are not rendered obvious by Oka as discussed above. As best understood, Gagne does not provide any teaching that would remedy the deficiencies of Oka in this regard. For at least this reason, even if Oka and Gagne were combined (although there appears to be no rationale for combining), the resultant combination would not teach or suggest the various features of claims 5, 13, 19, and 23. Accordingly, Applicant respectfully requests that the rejection of claims 5, 13, 19, and 23 be withdrawn.

Amendments to the Claims

Unless otherwise specified, amendments to the claims are made for purposes of clarity, and are not intended to alter the scope of the claims or limit any equivalents thereof. The amendments are supported by the Specification and do not add new matter.

CONCLUSION

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

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